

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SHAWN CONNORS, Individually and on Behalf of
All Other Persons Similarly Situated,
Plaintiffs,

v.

MGM SPRINGFIELD, LLC
Defendant

Civil Action No.: 3:19-cv-30144

Joint Motion to Extend Date to File Status Update

The parties to this action hereby jointly move this Court to extend the date on which they must file a post-mediation status update. In support of this request, the parties state as follows:

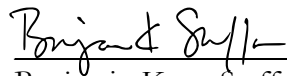
1. Plaintiff filed this putative class and collective action on October 28, 2019, alleging violations of state and federal wage-and-hour laws.
2. Defendant filed its Answer to Plaintiff's Class Action Complaint on November 26, 2019.
3. On December 4, 2019, this Court notified the parties that an initial scheduling conference would be held on February 13, 2020 at 10:00 am.
4. The parties agreed to engage in an early mediation of this action, which was scheduled to take place in Boston on March 17, 2020.
5. On January 23, 2020, the parties jointly asked this Court to re-schedule the scheduling conference in light of the parties' plan to mediate the dispute.
6. On January 24, 2020, this Court granted the parties' request to postpone the scheduling conference and ordered the parties to file a joint status report by March 31, 2020 to report on whether the case had settled and, if not, to propose a new date for the scheduling conference or another status report.

7. The mediation scheduled for March 17, 2020 was cancelled in light of the outbreak of COVID-19, which presented considerable travel-related restrictions and also prevented the parties and their clients from being able to prepare for the mediation.

8. The parties are currently working with the mediator on a new mediation date and expect that to possibly occur in June.

9. The parties propose to file a status report as to the outcome of that mediation on or before July 14, 2020, informing the Court as to whether the case was or was not successfully resolved at the mediation and any related scheduling issues.

Respectfully and jointly submitted,



Benjamin Knox Steffans (BBO #568535)
Steffans Legal PLLC
7 North Street, Suite 307
Pittsfield, MA 01201
bsteffans@steffanslegal.com
(413) 418-4176

and

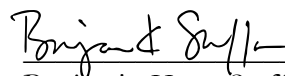
Matthew Kane (with permission)(BKS)
Matthew Kane (admitted *pro hac vice*)
Amy Beverlin (admitted *pro hac vice*)
McGuire Woods LLP
1800 Century Park East, 8th Floor
Los Angeles, California 90067
mkane@mcguirewoods.com
abeverlin@mcguirewoods.com
(310) 315-8200
Attorneys for Defendant

/s/ Jeffrey Morneau (with permission)(BKS)
Jeffrey S. Morneau (BBO# 643668)
Connor & Morneau LLP
273 State Street, 2nd Floor
Springfield, MA 01103
jmorneau@cmolawyers.com
(413) 455-1730

Attorneys for the Plaintiff and Putative
Class and Collective

Certificate of Service

I certify that this document was filed through the CM/ECF system and will be sent electronically to the registered participants as identified on the NEF.

A handwritten signature in black ink, appearing to read "Benjamin Knox Steffans", written over a horizontal line.

Benjamin Knox Steffans

Date: March 31, 2020